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Attorneys for Defendant

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

ANITA BROKAW,) Civil No. 3:15-cv-04313-SK
)
Plaintiff,) DEFENDANT'S EX PARTE MOTION
v.) AND PROPOSED ORDER TO EXTEND
) THE TIME FOR DEFENDANT TO FILE
CAROLYN W. COLVIN,) HER ANSWER AND THE CERTIFIED
Acting Commissioner of Social Security,) ADMINISTRATIVE RECORD
)
Defendant.)
)
)
)
)

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, through her undersigned attorneys, hereby moves to extend the time by 16 days from December 23, 2015, to January 8, 2016, to file her Answer and the Certified Administrative Record (CAR).

There is good cause for this extension because Defendant's counsel attempted to procure an additional copy of the CAR to serve Plaintiff. Defendant anticipated that it would be received today, but has not received it yet. As such, the additional time is needed to obtain and serve Plaintiff with a copy of the CAR and accommodate the holidays.

1- Defendant's Ex Parte Motion and Proposed Order to Extend the Time for Defendant to File Her Answer and the Certified Administrative Record

1 Defendant's counsel has not contacted Plaintiff to determine whether she consents to
2 this motion because of the holidays and to file this motion expeditiously.

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4 Respectfully submitted,

5 Dated: December 23, 2015

BENJAMIN B. WAGNER
United States Attorney

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8 By: /s/ Henry L. Chi
HENRY L. CHI
Special Assistant U.S. Attorney

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10 Attorneys for Defendant

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14 ORDER

15 APPROVED AND SO ORDERED.

16 DATED: December 23, 2015

17 
SALLIE KIM
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States, and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. On December 23, 2015, I caused service of Defendant's Ex Parte Motion and Proposed Order to Extend the Time for Defendant to File Her Answer and the Certified Administrative Record via certified mail, return receipt, and regular mail to the following address:

Anita Brokaw
1874 Fred Jackson Way
Richmond, CA 94801

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 23, 2015

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Henry L. Chi
HENRY L. CHI
Special Assistant U.S. Attorney

Attorneys for Defendant

3- Defendant's Ex Parte Motion and Proposed Order to Extend the Time for Defendant to File Her Answer and the Certified Administrative Record